

MELINDA HAAG (CABN 132612)  
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)  
Chief, Criminal Division

KYLE F. WALDINGER (ILBN 6238304)  
HALLIE MITCHELL HOFFMAN (CABN 210020)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7129  
FAX: (415) 436-7234  
hallie.hoffman@usdoj.gov

Attorneys for Plaintiff

**FILED**

AUG 19 2013

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUIN NGOC RUDIN,  
a/k/a DEAN RUBIN,  
a/k/a DAVID RUBIN,

Defendant.

CASE NO. CR 13-0149 JST

STIPULATION AND ~~PROPOSED~~ ORDER TO  
CONTINUE STATUS CONFERENCE AND TO  
EXCLUDE TIME FROM AUGUST 16, 2013  
THROUGH SEPTEMBER 27, 2013

The defendant, Quin Ngoc Rudin, a/k/a Dean Rubin, a/k/a David Rudin, represented by Edward Robinson, Esquire, and the government, represented by Kyle F. Waldinger and Hallie Mitchell Hoffman, Assistant United States Attorneys, jointly request to continue the status hearing in the above captioned matter from August 16, 2013 at 10:30 a.m. to September 27, 2013 at 9:30 a.m.. The parties request this continuance because there are ongoing discussions about the appropriate resolution of the matter, and the defense is continuing to review the voluminous discovery that the government provided and to conduct necessary investigation.

Counsel further requests that time be excluded under the Speedy Trial Act between August 16,

STIPULATION AND [PROPOSED] ORDER TO CONTINUE AND TO EXCLUDE TIME

CR 13-0149 JST

1 2013 and September 27, 2013 because the defense needs time for effective preparation of the case.  
2

3 Dated: August 16, 2013

/s/ Hallie Mitchell Hoffman

4 

---

Hallie Mitchell Hoffman  
5 Assistant United States Attorney

6 Dated: August 16, 2013

/s/ Edward Robinson

7 

---

Edward Robinson  
8 Attorney for Quin Rudin  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

STIPULATION AND [PROPOSED] ORDER TO CONTINUE AND TO EXCLUDE TIME

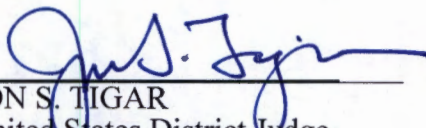
CR 13-0149 JST



~~PROPOSED~~ ORDER

The parties jointly moved to continue the status conference in this matter to September 27, 2013 at 9:30 a.m.. Counsel requested the continuance because the parties are in ongoing discussions about the appropriate resolution of the case and the defense counsel needs additional time to review the voluminous discovery and to conduct necessary investigation.

Based upon the representation of counsel and for good cause shown, the Court finds that failing to exclude the time between August 16, 2013 and September 27, 2013 would unreasonably deny the defendant continuity of counsel and would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between August 16, 2013 and September 27, 2013 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between August 16, 2013 and September 27, 2013 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: 8/18/13  
JON S. TIGAR  
United States District Judge

STIPULATION AND [PROPOSED] ORDER TO CONTINUE AND TO EXCLUDE TIME

CR 13-0149 JST